

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION
CASE NUMBER:**

A.B. Holling Construction, Inc.,

Plaintiff,

v.

Sapelo Creative Insurance Solutions, LLC,

Defendant.

2:18-cv-988-PMD

NOTICE OF REMOVAL

TO: THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA, CHARLESTON DIVISION:

The Defendant, Sapelo Creative Insurance Solutions, LLC, would respectfully show in support of its notice of removal that:

1. This action was commenced on or about March 16, 2018 in a Court of Common Pleas for Charleston County, South Carolina. A copy of the Plaintiff's Summons and Complaint are attached, there being no other, pleadings or orders served upon the Defendant in this action.

2. This action is one of a civil nature over which the District Courts of the United States have original jurisdiction, said action having been brought by the Plaintiff against the Defendant for negligent misrepresentation, breach of contract and breach fiduciary duty for the Defendants alleged failure to advise Plaintiff regarding the lapse, nonrenewal and/or cancellation of its workers comp policy resulting in damages sustained by Plaintiff when an employee of Plaintiff was injured while no workers comp policy was in effect.

3. The amount in controversy exceeds Seventy-Five Thousand and No/100 (\$75,000.00) Dollars, exclusive of interest and costs, all of which will more fully appear from the attached Complaint; there is complete diversity of citizenship and, therefore, this Court has jurisdiction in accordance with Title 28 U.S.C. §1332(a)(1).

4. Venue in this matter is proper in the Charleston Division in this Court in accordance with Title 28 U.S.C. §1441(a).

5. Upon information and belief, at the time of the commencement of this action. The Defendant is a limited liability company organized pursuant to the laws of the state of Georgia with its principal place of business in the state of Georgia. The Plaintiff is a corporation organized and existing pursuant to the laws of the state of South Carolina with its principal place of business in Charleston, South Carolina, by which there is complete diversity of citizenship between the Plaintiff and the Defendant.

6. The Defendant, Sapelo Creative Insurance Solutions, LLC, has filed no pleadings in this action with the Court of Common Pleas for the State of South Carolina; however, the Defendant's Answer is filed contemporaneously herewith.

7. The Defendant has furnished to the Clerk of Court for Charleston County a copy of this Notice of Removal.

MURPHY & GRANTLAND, P.A.

s/J.R. Murphy
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April 11, 2018